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October 12, 2023

Via ECF

Honorable Arun Subramanian, U.S.D.J.  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Edward O'Donnell, 23 Cr. 499

Dear Judge Subramanian:

As Your Honor is aware, we represent Edward O'Donnell in the above-referenced matter. We are writing to request an extension of time from October 12, 2023 to October 19, 2023, for Mr. O'Donnell to return the fully executed personal recognizance bond.

Mr. O'Donnell has identified two financially responsible persons – Christopher King and Judith Morgalia – who have agreed to co-sign his personal recognizance bond. Yesterday, the U.S. Attorney's Office approved both individuals as co-signers. Through the undersigned, Mr. King and Ms. Morgalia scheduled phone calls with the U.S. Attorney's Office today to complete the process for remote signing the bond. On two occasions, despite being available and waiting by the phone at the scheduled times, neither Mr. King nor Ms. Morgalia received phone calls from the U.S. Attorney's Office at the designed times. Mr. King is traveling and will have limited access to a phone starting tomorrow until next Monday. Mr. O'Donnell is seeking an additional week to coordinate with the U.S. Attorneys' Office the logistics of completing the process for remote signing the personal recognizance bond.

He has fully complied with all other conditions of his release and will continue to comply with the conditions of his release.

Respectfully submitted,

/s/ Tracy A. Burnett  
Tracy A. Burnett

SO ORDERED.

The Clerk of Court is directed to  
terminate the motion at ECF No. 22.



Arun Subramanian, U.S.D.J.  
Date: October 16, 2023

cc: Kiersten Fletcher, AUSA  
Allison Nichols, AUSA  
Margaret Graham, AUSA  
(Via ECF)

Andrew Berglind  
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